

United States District Court
District of Oregon

FILED 06 JAN 18 09:55 USDC-ORE

UNITED STATES OF AMERICA

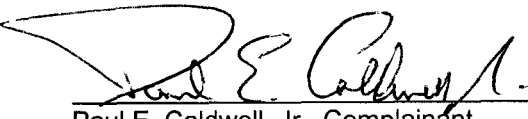
v.
SUZANNE NICOLE SAVOIE

CRIMINAL COMPLAINT
CASE NUMBER 06-2006m

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 2, 2001, in Glendale, Douglas County, in the District of Oregon, Defendant SUZANNE NICOLE SAVOIE unlawfully and willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a building and other real and personal property used in interstate commerce and used in activities affecting commerce, namely, a building and its contents located at Superior Lumber Company, located at 2695 Glendale Valley Road, Glendale, Douglas County, Oregon; in violation of Title 18 United States Code, Section(s) 844(i).

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts: See attached Affidavit hereto

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

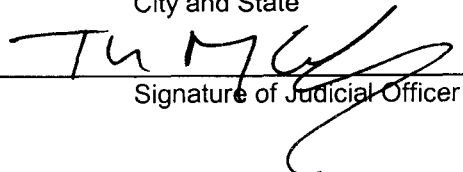

Paul E. Caldwell, Jr., Complainant

Sworn to before me and subscribed in my presence,

1/18/06
Date

Thomas M. Coffin, U.S. Magistrate
Name & Title of Judicial Officer

at Eugene, Oregon
City and State


Signature of Judicial Officer

AFFIDAVIT FOR COMPLAINT

I, Paul E. Caldwell, Jr., first being duly sworn, depose and state:

I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have so been employed for sixteen years. I am authorized as such to investigate violations of Title 18 of the United States Code, including Title 18 section 844(i), arson, relating to the destruction of property by arson. I have two years experience investigating environmental and animal rights extremist motivated violent acts, including arson.

This affidavit is submitted to support a complaint and arrest warrant charging Suzanne Nicole Savoie, also known as (aka) India, a white female, date of birth June 10, 1977, with the arson of Superior Lumber Company, 2695 Glendale Valley Road, Glendale, Douglas County, Oregon, on January 2, 2001, in violation of Title 18 section 844(i), Arson.

I am currently assigned to investigate a series of arsons which occurred from 1996 through 2001, including the arson described above, linked to groups calling themselves the Earth Liberation Front (ELF) and Animal Liberation Front (ALF). As part of my duties I have spoken with other investigators who conducted investigation into these arsons. As a result, I have become aware of the following information:

I have reviewed reports prepared by Special Agent John Comery, U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), that revealed the fire at Superior Lumber on January 2, 2001 was caused by two incendiary devices containing ignitable liquids. SA Comery observed melted plastic five gallon buckets and other items which he suspected were components used in the incendiary devices. He collected and submitted these items for laboratory examination.

I reviewed a report dated February 27, 2002 prepared by Brennan S. Phillips and Bryant T. Hart, ATF Explosives Enforcement Officers, Walnut Creek, California, wherein they state an evaluation of the items collected at the Superior Lumber fire scene indicated the remains of two improvised incendiary bombs. Each of the bombs consisted of a quantity of ignitable liquid contained in two plastic buckets. An electronic time delay device powered by batteries was used to trigger ignition.

I reviewed a report prepared by Bradley D. Cooper, Forensic Chemist, ATF, Walnut Creek, California, dated September 27, 2001 which states gasoline and a heavy petroleum distillate were present in the items submitted from Superior Lumber crime scene. Heavy petroleum distillates include diesel fuel and #2 fuel oil

I reviewed reports written by FBI Special Agent John Ferreira in which I learned that Ferreira spoke with a confidential source (CS-1) who stated that s/he was involved in a conspiracy with others to set the fire at Superior Lumber Company in Glendale, Oregon, on January 2, 2001, and did set the fire. CS-1 said that among the others involved in the arson were Daniel McGowan and McGowan's girlfriend, known as "India." CS-1 told Ferreira that McGowan and India served as lookouts and were equipped with radio transmitters to communicate with the other arsonists involved in preparing the incendiary bombs, including CS-1.

I reviewed other reports prepared by SA Ferreira in which I learned that Ferreira spoke with a confidential source (CS-4) who stated s/he was involved in the arson at Superior Lumber Company in Glendale, Oregon, on January 2, 2001. CS-4 told Ferreira that among others involved in that arson were Daniel McGowan and his girlfriend, who served as lookouts while

others set the incendiary devices. CS-4 identified McGowan from a photograph and noted the arsonists used “walkie-talkies” to communicate at the scene.

On January 17, 2006, I spoke with Detective Greg Harvey, Eugene, Oregon, Police Department. Detective Harvey told me that during consensually recorded conversations between CS-1 and Daniel McGowan in August 2005, McGowan stated that India was currently living with someone named “Luke” and together they had purchased twenty-four (24) acres of land and were living in the Applegate area of Southern Oregon.


On January 18, 2006, SA Ferreira told me that after receiving the above information from Detective Harvey he contacted a confidential source (CS-5) and asked CS-5 if s/he knew anyone using the name “India.” CS-5 told Ferreira that s/he knew of someone named India Savoie who was associated with a Luke Rudinger. Ferreira reported this information to Detective Harvey, who conducted database searches of the name Savoie and identified Suzanne Nicole Savoie, a white female, date of birth June 10, 1977, living in the Applegate area of Southern Oregon. Ferreira displayed a photograph of Suzanne Nicole Savoie, date of birth June 10, 1977, to CS-1, who identified her as the woman named India involved in the arson of Superior Lumber Company on January 2, 2001.

On January 18, 2006 I spoke with SA Ferreira, who confirmed that Superior Lumber Company was involved in interstate commerce in that they shipped products outside of the state and received products from places outside Oregon.

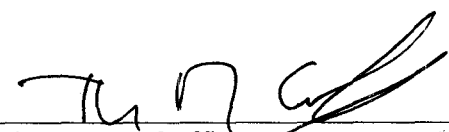
Based on the foregoing and my sixteen years investigative experience, I have probable cause to believe that on January 2, 2001, in Douglas County, Oregon, in the District of Oregon, Suzanne Nicole Savoie, a white female, date of birth June 10, 1977, committed the arson of the

Superior Lumber Company, located at 2695 Glendale Valley Road, Glendale, Douglas County, Oregon, on January 2, 2001, in violation of Title 18 section 844(i), Arson.

I have discussed the complaint and accompanying affidavit with Assistant United States Attorney Kirk Engdall, who informed me that in his opinion the complaint and affidavit are legally and factually sufficient.


PAUL E. CALDWELL, JR.
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me and in my presence this 18th day of January, 2006.


Thomas M. Coffin
United States Magistrate Judge
District of Oregon